



December 30, 2008

By Electronic Mail

Karen Majcher  
VP High Cost and Low Income Division  
Universal Service Administrative Company  
2000 L St., N.W., Suite 200  
Washington, D.C. 20036

Re: Mark Twain Communications Company  
Study Area 429001  
WC Docket No. 05-337, CC Docket No. 96-45

Dear Ms. Majcher:

This letter is in response to the December 10, 2008 FCC Public Notice, DA 08-2684, that directed all competitive ETCs to confirm with USAC their March 2008 high-cost support information, or file corrections thereto. Mark Twain Communications Company (MTCC) has examined the data published by USAC on its website for this purpose which states at Tab 2 that the March 2008 HCL amount was \$5,739 and the ICLS amount was \$5,456 for a total of \$11,195. MTCC is not able to confirm that these amounts are correct or to state what the correct amounts are it was eligible to receive during March 2008.<sup>1</sup>

As you are aware, MTCC has been engaged in extended discussions with your staff in order to resolve the complex issues raised in, or related to, MTCC's Request for Review of your August, 2005 decision. Among these issues are whether the amount of HCL and ICLS support for the ILEC with which MTCC competes have been properly computed and whether MTCC's line counts have been accurately recognized. We understand you staff is currently considering further adjustments to the amounts that have been paid to MTCC.

In addition to those unresolved issues, MTCC's lines are in the area of an ILEC which has a disaggregation plan in effect but the USAC Disbursement Data shows only the total HCL and ICLS for the ILEC. Further ICLS support determination requires separate rates for residential/single-line business and multi-line business that is also apparently not available.

---

<sup>1</sup> Tab 3 lists MTCC's lines for HCL purposes as 1,972 and for ICLS purposes as 986. The correct number of lines for both purposes is 986.

---

Subsidiary of Mark Twain Rural Telephone Co.

---

P.O. Box 128, Hwy 6 E. Hurdland, MO 63547-0128 Phone: (660) 423-6822 Fax: (660) 423-5496

In conclusion, until MTCC is able to review the further adjustments being considered by your staff, and the data applicable to the ILEC, it cannot agree or disagree with the USAC calculation of the amount of support for which it was eligible in March 2008.

Sincerely yours,

A handwritten signature in blue ink that reads "Jim Lyon".

Jim Lyon  
Customer Service Manager  
Mark Twain Communications Company

Cc: Jennifer McKee, FCC  
Secretary, FCC  
Craig Davis, USAC  
Sammy Kahn, USAC